REMARKS

In the Advisory Action, the Examiner refused to enter the Applicants' previous claim amendments from the Amendment and Response to Final Office Action. However, the Examiner indicated that claims 7, 8, 10, 17, 20, 24, 28-34, 52, 54, 56-63, and 70-72 would be allowable if submitted in a separate, timely filed amendment canceling the non-allowable claims. Regarding the remaining independent claim 1 and corresponding dependent claims 2-6, 12, 14, 18, 19, 21-23, and 67-69, the Examiner indicated that the claim recitation of "biased" in independent claim 1 raised new issues that require further consideration. However, the Examiner indicated that these claims 1-6, 12, 14, 18, 19, 21-23, and 67-69 would be allowable if independent claim 1 recited "spring loaded" rather than "biased," as set forth in the previously allowable dependent claim 13. *See* Advisory Action, Paper No. 20040916, Page 2; Final Office Action, Paper No. 20040624, Page 6.

By this paper, the Applicants amended the claims to place all claims in condition for allowance based on the allowable subject matter set forth in the Final Office Action. *See id.* First, the Applicants incorporated the allowable dependent claim 13 and the intervening claim 11 into independent claim 1. By way of this amendment, independent claim 1 now recites "spring loaded" rather than "biased" to expedite allowance of the present application. Second, the Applicants incorporated the allowable dependent claim 9 into independent claim 7. Third, the Applicants incorporated the allowable dependent claim 27 and the intervening claim 66 into independent claim 24. Fourth, the Applicants incorporated the allowable dependent claim 55 and the intervening claim 53 into independent claim 52. Fifth, the Applicants rewrote the allowable dependent claims 10, 17, 20, 31, 33, 34, 54, and 58 into independent form. Sixth, the Applicants changed the dependencies of claims 12, 14, and 28. Seventh, the Applicants canceled claims 9, 11, 13, 27, 53, 55, and 64-66. Accordingly, all of the pending claims are currently in condition for allowance.

The Applicants also stress that the present and previous amendments are not believed to narrow the scope of the present claims, but rather these amendments broaden the scope or

increase potential damages for infringement of the present claims. For example, with regard to independent claim 1, the Applicants stress that the recitation of "spring loaded" is not narrower than the claim recitation of "biased." Specifically, the claim recitation of "spring loaded" may be defined as *biased* or having a tendency in a certain direction, which *biased* or directional tendency may originate from a mechanical, hydraulic, pneumatic, electromechanical, or other suitable force-producing device or interrelationship between parts. For this reason, the Applicants believe that the claim recitation of "biased" rather than "spring loaded" does not raise new issues that require further consideration, and that the claim recitation of "spring loaded" is at least as broad as or broader than the claim recitation of "biased." Thus, the Applicants *do not believe* that these specific amendments, and other amendments previously made to the pending claims, narrow the scope of the claims.

However, if the present or the previous amendments narrow elements of the claims in any way, then Applicants emphasize that it is not for reasons relating to patentability. For example, the Applicants note that certain amendments clarify the elements of the claim, yet these amendments are neither necessary nor required by the Examiner to overcome rejections under 35 U.S.C. §§ 101, 102, 103, 112, or other relevant laws relating to patentability. However, if any amendments do, *arguendo*, narrow elements of the claims for reasons relating to patentability, then the Applicants do not believe these amendments preclude application of the doctrine of equivalents in accordance with the Supreme Court's recent decision in *Festo*. *See Festo Corp. v. Shoketsu Kinzuku Kogyo Kabushiki Co.*, 62 U.S.P.Q. 2d 1705, 1714 (Sup. Ct. 2002); *see also Festo Corp. v. Shoketsu Kinzoku Kogyo Kabushiki Co.*, 68 U.S.P.Q. 2d 1321, 1327-28 (Fed. Cir. 2003). The Applicants, as those of skill in the art, are neither aware of, nor do Applicants foresee, any equivalents to any such claim elements, which are *arguendo* narrowed for reasons relating to patentability. *See Festo*, 62 U.S.P.Q. 2d at 1714. Moreover, if any equivalents exist, *arguendo*, at the time of these amendments, then the Applicants emphasize that the reasons for amending the particular claim element are only tangentially related to the equivalents. *See id.* Finally, if equivalents are, *arguendo*, foreseeable or directly related to the reasons for these amendments, then the Applicants respectfully assert that shortcomings of the language, and other

reasons, prevented the Applicants from adequately describing the particular equivalent. *See Festo*, 68 U.S.P.Q. 2d at 1327-28. For these reasons, the Applicants do not surrender any potentially existing or future equivalents relating to elements of the present claims.

In view of the foregoing amendments and remarks, the Applicants respectfully request reconsideration and allowance of the pending claims.

Conclusion

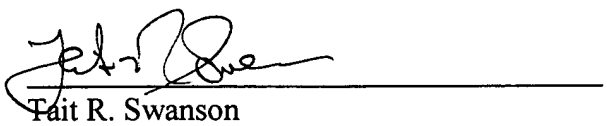
The Applicants respectfully submit that all pending claims should be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve any other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Authorization for Extensions of Time and Payment of Fees

In accordance with 37 C.F.R. § 1.136, Applicants hereby provide a general authorization to treat this and any future reply requiring an extension of time as incorporating a request thereof. The Commissioner is authorized to charge the requisite fee, and any additional fees which may be due, to Deposit Account No. 06-1315; Order No. ITWO:0015/YOD/SWA.

Respectfully submitted,

Date: October 1, 2004



Tait R. Swanson
Registration No. 48,226
FLETCHER YODER
P.O. Box 692289
Houston, TX 77269-2289
(281) 970-4545